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July 22, 2019

**VIA ECF**

Honorable Robert W. Lehrburger  
500 Pearl Street, Room 18D  
United States Courthouse  
Southern District of New York  
New York, New York 10007

Re: Entretelas Americanas S.A. v. Soler, Index No. 19-3658 (LAK) (RWL)

Dear Magistrate Judge Lehrburger:

We represent Defendant Rafael Ignacio Soler (“Soler”) in the above-referenced action by Plaintiff Entretelas Americanas S.A. (“Entretelas”). Pursuant to Section I(F) of Your Honor’s Individual Practices in Civil Cases, we write to request an extension of time for Soler to file a motion to dismiss Entretelas’s complaint against him (the “Motion to Dismiss”).

On June 19, 2019, Your Honor set a briefing schedule requiring Soler to file the Motion to Dismiss on or before August 2, 2019. However, the parties are currently discussing a variety of means by which they can pursue potential settlement discussions. In order to allow these discussions to continue, Soler requests that his time to file the Motion to Dismiss be extended from August 2, 2019, to September 13, 2019. Counsel for Entretelas has consented to the extension and will file Entretelas’s opposition to the Motion to Dismiss on or before October 14, 2019. Soler requests permission to file his reply on or before October 28, 2019.

This is Soler’s first request for an extension of time to file the Motion to Dismiss. We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Vincent J. Syracuse

Cc: Counsel of record (*via* ECF)